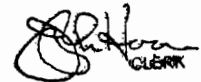


FILED

JUL 20 2009


CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of

CIV09- 4107

One Parcel of Property located at
1908 River Bluff Dr., Brandon,
Minnehaha County, South Dakota,
with all appurtenances, fixtures,
attachments, and improvements thereon,

**FORFEITURE COMPLAINT
IN REM**

Personal Property Described as:
One LG 50" plasma TV; One Bulova
G0953 grandfather clock; one game table;
one Providence 8' pool table with cover and
floor rack; appliances including one LG
French door refrigerator; one Bosch double
oven; one Bosch dishwasher, one GE
microwave, one Bosch 5-burner gas cook-
top stove; and fixtures, including but not
limited to surround sound, including
speakers and keyboard; draperies, fabric,
lining, rods, window treatments, blinds;
and alarm system;

Wells Fargo Bank Account
#XXXXXXX3385, in the name of
Christopher J. Reisch;

Great Western Bank Account
#XXXXXXX4070, in the name of
Christopher J. Reisch;

Great Western Bank Account
#XXXXXXX7555, in the name of
Mike J. Reisch and/or Luverne Sports;

2007 Gold Yukon Denali, VIN
1GKFK63887J290988, bearing
SD License 1WC 518;
Certified Mail #70081300 0001 9567 5859
containing \$420 in cash;

Certified Mail #7008 2810 0001 7199 6571
containing \$890 in cash;

Certified Mail #7008 2810 0001 7199 6564
containing \$410 in cash;

Certified Mail #7008 1300 0001 9567 5880
containing \$550 in cash;

Certified Mail #7008 1300 0001 9567 5873
containing \$295 in cash;

Certified Mail #7008 1300 001 9567 6115
containing \$800 in cash;

Certified Mail #7008 2810 0001 7199 6540
containing \$1000 in cash;

Certified Mail #7007 1490 0001 6468 7473
containing \$400 in cash;

Certified Mail #7007 1490 0001 6468 7480
containing \$1000 in cash;

Certified Mail #7008 2810 0001 7199 6557
containing \$900 in cash;

Certified Mail #7008 1300 0001 9567 5866
containing \$2200 in cash;

Certified Mail #7008 2810 0001 7199 6533
containing \$2000 in cash;

Certified Mail #7008 1300 0001 9567 6122
containing \$440 in cash;

Certified Mail #7008 2810 0001 7199 6526
containing \$381 in cash;

Certified Mail #7008 2810 0001 7199 6588
containing \$300 in cash;

Express Mail #EB825346398US

containing a total of \$10,000 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Redfield, SD 57469
containing a \$515 check;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Sioux Falls, SD 57110
containing a \$720 check;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Sioux Falls, SD 57106
containing \$58 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Okoboji, IA 51355
containing \$270 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Hartington, NE 68739
containing \$120 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Pierre, SD 57501
containing \$23 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Brookings, SD 57006
containing \$190 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Hartington, NE 68739
containing \$90 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Hartington, NE 68739
containing \$50 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Luverne, MN 56156
containing \$3 in cash;

First Class Mail from 1908 River Bluff Dr.,

Brandon, SD 57005 to Edgerton, MN
containing \$400 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Luverne, MN 56156
containing \$200 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Mason City, IA 50401
containing \$45 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Waterloo, IA 50703
containing a \$965 check;

First Class Mail from 1908 River Bluff Dr.
Brandon, SD 57005 to Chandler, AZ 85248
containing a \$4,325 check;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Yankton, SD 57078
containing a \$545 check;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Redfield, SD 57469
containing a \$955 check and a
\$1,430 check;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Sioux Falls, SD 57108
containing \$55 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Pierre, SD 57501
containing \$50 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Rock Rapids, IA 51246
containing \$48 in cash;

First Class Mail from 1908 River Bluff Dr.,
Brandon, SD 57005 to Rock Rapids, IA 51246

containing \$15 in cash;

\$368,109 in cash;

A \$530 U.S. Postal money order;

Express Mail #EH472668285US
containing \$12,360 in cash;

Priority Mail #0308 0730 0000 1723 0554
containing \$2,300 in cash;

Certified Mail #7008 0150 0002 6216 8543
containing \$950 in cash;

Certified Mail #7008 0500 0000 9969 4148
containing \$1,610 in cash;

First Class Mail from Sioux Falls, SD 57106
to Mike Reisch,
containing \$55 in cash;

First Class Mail from Fargo, ND 58102
to LSS
containing a \$115 check;

First Class Mail from Aberdeen, SD 57401
to Mike Reisch,
containing \$115 in cash;

First Class Mail from Benson, MN 56215
to LSS
containing \$5 in cash;

First Class Mail from Luverne, MN 56156
to L.S.S.,
containing \$70 in cash;

First Class Mail from Fargo, ND 58103
to LSS
containing a total of \$55 in checks;

First Class Mail from Elyston, MN 56028
to Mike or Chris Reisch
containing a \$100 check;

First Class Mail from Sioux Falls, SD 57107
to Mike Reisch,
containing a \$460 check;

First Class Mail from Fort Pierre, SD 57532
to 1908 River Bluff Dr., Brandon, SD 57005,
containing \$160 in cash;

First Class Mail from Hendrick, MN 56134
to L.S.S.
containing \$360 in cash;

3 one-ounce Gold Eagle coins;

1 one-ounce gold maple leaf coin;

1 #5 1901 gold piece;

1 1/10th of an ounce Gold Eagle coin.

Defendants.

Plaintiff, United States of America, by its attorneys, Marty J. Jackley,
United States Attorney for the District of South Dakota, and Stephanie C.
Bengford, Assistant U.S. Attorney, brings this complaint in accordance with
Supplemental Rule G(2) of the Federal Rules of Civil Procedure, and alleges as
follows:

NATURE OF THE ACTION

1. Plaintiff, United States of America, by and through the

undersigned Assistant United States Attorney, alleges the following upon information and belief for its claim against the defendant real property (hereinafter "defendant real property"), for violations of 18 U.S.C. §§ 1956 or 1957 and 18 U.S.C. § 981(a)(1)(A) or 18 U.S.C. § 981(a)(1)(C)¹ and 18 U.S.C. § 1953 or 18 U.S.C. § 1084 or 18 U.S.C. § 1955 or 18 U.S.C. § 1952.

2. This is an action to forfeit defendant property, as described in paragraph 3 below (hereinafter "defendant property") and the personal property contained within the home as described in paragraph 3.a. below, to the United States for violations of 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 1953 or 18 U.S.C. § 1084 or 18 U.S.C. § 1955 or 18 U.S.C. § 1952.

THE DEFENDANTS IN REM

3. The defendant real property is known and numbered as 1908 River Bluff Drive, Brandon, SD, 57005, with all appurtenances, improvements, fixtures and attachments thereon, and is more fully described as:

Lot 8 in Block 1 of the Bluff's Addition, an Addition to the City of Brandon, Minnehaha County, South Dakota, according to the recorded plat thereof.

¹ 18 U.S.C. § 981(a)(1)(C) includes within the definition of specified unlawful activity 18 U.S.C. § 1956(c)(7). Section 1956(c)(7) includes within its definition of specified unlawful activity those crimes listed in 18 U.S.C. § 1961. Section 1961 lists sections 1952, 1953, 1955, and 1084.

The record owner of the defendant real property is Kathryn A. Jensen a/k/a Kathryn A. Reisch.² Michael J. Reisch, Sr., a/k/a Mike Reisch³ may believe he has an interest in the defendant real property as that is the home where he resides.

- a. The following personal property, according to records seized during the search of the residence of Mike and Kathryn Reisch, is contained in the home:

Personal property described as: One LG 50" plasma TV; One Bulova G0953 grandfather clock; one game table; one Providence 8' pool table with cover and floor rack; appliances including one LG French door refrigerator; one Bosch double oven; one Bosch dishwasher, one GE microwave, one Bosch 5-burner gas cooktop stove; and fixtures, including but not limited to surround sound, including speakers and keyboard; draperies, fabric, lining & rods; window treatments and blinds, and alarm system.

4. The defendant real property and the personal property listed in paragraph 3.a. has not been seized but it is located within this District and within the jurisdiction of the Court. The United States does not request

² Kathryn Reisch may be referred to in the complaint as either "Kathy Reisch", "Kathy Jensen", "Kathryn Reisch", "Kathy Jensen Reisch" or "Kathryn Jensen". Her middle initial may also be used.

³ Michael J. Reisch, Sr. will be hereinafter referred to in the complaint as either "Mike Reisch", "Michael J. Reisch", "Michael J. Reisch, Sr." or "Michael Reisch, Sr." or "Mike J. Reisch". Mike R. Reisch, Jr. will be referenced with the "Jr." to distinguish the two.

authority from the Court to seize the defendant real property or the personal property discussed in paragraph 3.a. at this time. The United States will, as provided by 18 U.S.C. § 985(b)(1) and (c)(1):

- a. post notice of the Complaint on the defendant real property,
and
- b. serve notice of this action on the defendant real
property owner, and any other person or entity who may claim an
interest in the defendant, along with a copy of this Complaint, and
- c. execute a writ of entry for purposes of conducting an
inspection and inventory of the property, and
- d. file a lis pendens in county records of the defendant
real property's status as a defendant in this in rem action.

Pursuant to 19 U.S.C. § 1606, the United States will cause an appraisal to be done of the property.

5. The other defendant property, which does not consist of real property, consists of the following property that was seized:

- a. Wells Fargo Bank Account, #XXXXXX3385, in the name of
Christopher J. Reisch;⁴ a check in the amount of \$10,357.26,
#0443706852, was seized on April 30, 2009 from the Wells Fargo located
at 101 N. Phillips Avenue, Sioux Falls, South Dakota; the check was

⁴ Hereinafter referred to in complaint as "Chris Reisch", "Christopher J. Reisch" or "Christopher Reisch".

deposited in the temporary forfeiture account for the U.S. Postal Inspection Service (USPIS). After filing of the complaint, these funds will be transferred to the United States Marshal Service (USMS).

b. Great Western Bank Account, #XXXXXX4070, in the name of Christopher J. Reisch; a check in the amount of \$28,638.82, check # 352265, was seized on April 30, 2009, from the Great Western Bank located at 100 N. Phillips Avenue, Sioux Falls, South Dakota; the check was deposited into the temporary forfeiture account for the USPIS. After filing of the complaint, these funds will be transferred to the USMS.

c. Great Western Bank Account, #XXXXXX7555, in the name of Mike J. Reisch and/or Luverne Sports; a check in the amount of \$20,464.83, check # 352261, was seized on April 30, 2009, from the Great Western Bank located at 100 N. Phillips Avenue, Sioux Falls, South Dakota; the check was deposited in the temporary forfeiture account for the USPIS. After filing of the complaint, these funds will be transferred to the USMS.

d. 2007 Gold Yukon Denali, VIN 1GKFK63887J290988, bearing SD License 1WC 518, as well as original title, registration, keys and any other door opening devices, purchased by Mike J. Reisch and titled in his name, was seized from the garage of Mike Reisch's residence located at 1908 River Bluff Drive in Brandon, SD, on May 4, 2009. The vehicle is presently in the custody of the U.S. Postal Inspection Service. After the filing of the complaint, the custody of the vehicle will transfer to the USMS.

e. Certified Mail #70081300 0001 9567 5859 from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.H.] [address redacted] Ipswich, SD 57451" containing \$420 in cash and a note stating "+420" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$420 in cash was turned into a check, is presently in the custody of USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

f. Certified Mail #7008 2810 0001 7199 6571 from "1908 River Bluff Dr., Brandon, SD 57005" to "[T.S.] [address redacted] Mason City, IA 50401" containing \$890 in cash and a note stating "[T.] Last Week - 1195, payment +450, +685, This week +950, Balance +890" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$890 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

g. Certified Mail #7008 2810 0001 7199 6564 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.R.] [address redacted] Spencer, IA 51301" containing \$410 in cash and a note stating "[J.] +410" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$410 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

h. Certified Mail #7008 1300 0001 9567 5880 from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.S.] [address redacted] Ft. Pierre, SD 57532" containing \$550 in cash and a note stating "+550" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$550 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

i. Certified Mail #7008 1300 0001 9567 5873 from "1908 River Bluff Dr., Brandon, SD 57005" to "[L.N.] [address redacted] Ft. Pierre, SD 57532" containing \$295 in cash and a note stating "+295" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$295 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

j. Certified Mail #7008 1300 0001 9567 6115 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.G.] [address redacted] DeSmet, SD 57231" containing \$800 in cash and a note stating "+800" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$800 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

k. Certified Mail #7008 2810 0001 7199 6540 from "1908 River Bluff

Dr., Brandon, SD 57005” to “[J.D.] [address redacted] Sioux Falls, SD 57106” containing \$1000 in cash and a note stating “+1000” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$1000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

l. Certified Mail # 7007 1490 0001 6468 7473 from “1908 River Bluff Dr., Brandon, SD 57005” to “[W.S.] [address redacted] Selby, SD 57472” containing \$400 in cash with a note stating “+400” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$400 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

m. Certified Mail # 7007 1490 0001 6468 7480 from “1908 River Bluff Dr., Brandon, SD 57005” to “[J.S.] [address redacted] Spencer, IA 51301” containing \$1000 in cash and a note stating “+1000” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$1000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

n. Certified Mail #7008 2810 0001 7199 6557 from “1908 River Bluff

Dr., Brandon, SD 57005” to “[N.S.] [address redacted] Pierre, SD 57501” containing \$900 in cash and a note stating “+900” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$900 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

o. Certified Mail #7008 1300 0001 9567 5866 from “1908 River Bluff Dr., Brandon, SD 57005” to “[G.M.] [address redacted] Pierre, SD 57501” containing \$2200 in cash and a note stating “+2200” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$2200 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

p. Certified Mail #7008 2810 0001 7199 6533 from “1908 River Bluff Dr., Brandon, SD 57005” to “[J.R.] [address redacted] Omaha, NE 68116” containing \$2000 in cash and a note stating “+2000” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$2000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

q. Certified Mail #7008 1300 0001 9567 6122 from “1908 River Bluff

Dr., Brandon, SD 57005” to “[H.G.] [address redacted] Pierre, SD 57501” containing \$440 in cash, a check from [G.]to Sports Service for \$360,⁵ and a note stating “+800” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$440 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

r. Certified Mail # 7008 2810 0001 7199 6526 from “1908 River Bluff Dr., Brandon, SD 57005” to “[T.W.] [address redacted] Sioux Falls, SD 57107” containing \$381 in cash and a note stating “+381” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$381 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

s. Certified Mail # 7008 2810 0001 7199 6588 from “1908 River Bluff Dr., Brandon, SD 57005” to “[C.D.] [address redacted] Mason City, IA 50401” containing \$300 in cash with a note stating “+300” “thanks Mike” and a 2009 Super Bowl betting board; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$300 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary

⁵ The \$360 was not included within the seizure warrant but is presently being maintained as evidence.

forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

t. Express Mail #EB825346398US from "Mike Reisch, 1908 River Bluff Dr., Brandon, SD 57005" to "[P.B.] [address redacted] Watertown, SD 57201" containing a white 9 inch by 12 inch envelope with 2 letter sized envelopes each marked "5.0" in top right corner each with \$5,000 in cash, for a total of \$10,000; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$10,000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

u. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.L.] [address redacted] Redfield, SD 57469" containing a note stating "Bal +500" "Pd 515" "Bal -15" "thanks Mike" and a \$515 check from D.L. and C.L. made out to cash; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$515 check is presently in the custody of the USPIS.

v. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[S.S.] [address redacted] Sioux Falls, SD 57110" containing a check for \$720 from the Christopher Reisch Wells Fargo Bank Account #XXXXXX3385; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$720 check is presently in the custody of the USPIS.

w. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to

“[L.G.] [address redacted] Sioux Falls, SD 57106” containing \$58 in cash with a note stating “+58” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$58 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

x. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[R.V.] [address redacted] Okoboji, IA 51355” containing \$270 in cash with a note stating “+270” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$270 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

y. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[L.P.] [address redacted] Hartington, NE 68739” containing \$120 in cash with a note stating “+120” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$120 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

z. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to

“[J.S.] [address redacted] Pierre, SD 57501” containing \$23 in cash and a note stating “+22.50” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$23 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

aa. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[S.N.] [address redacted] Brookings, SD 57006” containing \$190 in cash and a note stating “+190” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$190 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

bb. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[D.S.] [address redacted] Hartington, NE 68739” containing \$90 in cash and a note stating “+90” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$90 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

cc. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to

“[C.S.] [address redacted] Hartington, NE 68739” containing \$50 in cash and a note stating “+50” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$50 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

dd. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[J.R.] [address redacted] Luverne, MN 56156” containing \$3 in cash and a note stating “+3” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$3 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ee. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[V.K.] [address redacted] Edgerton, MN 56128” containing \$400 in cash with a note stating “+400” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$400 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ff. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to

“[T.K.] [address redacted] Luverne, MN 56156” containing \$200 in cash with a note stating “+200” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$200 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

gg. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[T.S.] [address redacted] Mason City, IA 50401” containing \$45 in cash and a note stating “+45” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$45 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

hh. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[M.L.] [address redacted] Waterloo, IA 50703” containing a check for \$965 from the Wells Fargo Bank account #xxxxxx3385 belonging to Christopher Reisch and a note stating “+965” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The check is presently in the custody of the USPIS.

ii. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[S.G.] [address redacted] Chandler, AZ 85248” containing a \$4325 check from the Great Western Bank account #xxxxxx4070 belonging to Christopher Reisch

and a note stating “[S.] +4325” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$4,325 check is presently in the custody of the USPIS.

jj. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[W.S.] [address redacted] Yankton, SD 57078” containing a \$545 check from the Great Western Bank account #xxxxxxx4070 belonging to Christopher Reisch and a note stating “+545” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$545 check is presently in the custody of the USPIS.

kk. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[D.W.] [address redacted] Redfield, SD 57469” containing a \$955 check from D.W. to Mike Reisch, a \$1430 check from the Great Western Bank account #xxxxxxx4070 belonging to Christopher Reisch, and a note stating “+2385” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The checks are presently in the custody of the USPIS.

ll. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[J.B.] [address redacted] Sioux Falls, SD 57108” containing \$55 in cash and a note stating “[J.]” “This week +665” “Last Week -610” “+55” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$55 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

mm. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[V.L.] [address redacted] Pierre, SD 57501" containing \$50 in cash and a note stating "[V.] +50" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$50 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

nn. \$368,109 in cash which was seized from the home where Michael J. Reisch, Sr., a/k/a Mike Reisch and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, SD 57005 on January 22, 2009, pursuant to a search warrant and was seized pursuant to a seizure warrant dated April 30, 2009; the cash was photographed and turned into a check which is presently in the custody of the U.S. Postal Inspection Service and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

oo. A \$530 U.S. Postal money order serial number 16029393232 dated January 21, 2009, seized on January 22, 2009, from the home in which Mike Reisch resided, 1908 River Bluff Dr., Brandon, South Dakota. The money order was also seized pursuant to the seizure warrant dated April 30, 2009, and is presently in the custody of the USPIS.

pp. Express Mail #EH472668285US from "[T.H.] [address redacted] Detroit Lakes, MN" to "LFS, PO Box 2494, Sioux Falls, SD 57101" containing

\$12,360 in cash; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$12,360 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

qq. Priority Mail with delivery confirmation #0308 0730 0000 1723 0554 from “[address redacted] Arnolds Park, IA 51331” to “LSS, PO Box 2494, Sioux Falls, SD 57101” containing white envelope with \$2300 in cash and a note on the outside of the envelope stating “Thanks Mike and Chris” “[J.C.]”; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$2300 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

rr. Certified Mail #7008 0150 0002 6216 8543 from “[address redacted] Spencer, IA 51301” to “L.S.S., PO Box 2494, Sioux Falls, SD 57101” containing \$950 in cash and a note stating “Mike here is 950, I’ll send more in 2 weeks and rest of what I owe you when I get my tax return.” “Thanks [K.G.]”; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$950 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ss. Certified Mail #7008 0500 0000 9969 4148 from “[C.W.] [address

redacted] Sibley, IA 51249-7000" to "L.L.S., PO Box 2494, Sioux Falls, SD 57101" containing \$1610 in cash and a note stating "Hey Mike-Will send more when I get to town to bank" "[C.]"; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$1610 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

tt. First Class Mail from "[J.C.] [address redacted] Sioux Falls, SD 57106" to Mike Reisch, 1908 River Bluff Dr, Brandon, SD 57005" containing \$55 in cash and a note stating "[J.C.] \$55"; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$55 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

uu. First Class Mail from "[L.W.] [address redacted] Fargo, ND 58102" to "LSS, PO Box 2494, Sioux Falls, SD 57101" containing a check from L.W. to LSS for \$115; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$115 check is presently in the custody of the USPIS.

vv. First Class Mail from "G. [T.] [address redacted] Aberdeen, SD 57401" to "Mike Reisch, 1908 River Bluff Dr., Brandon, SD 57005" containing \$115 in cash and a note stating "From [G.] T." "Week end 1-19, 115" "GT"; seized after mailed pursuant to a search warrant dated January 27, 2009. The

\$115 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ww. First Class Mail from “[J. & J.S.] [address redacted] Benson, MN 56215” to “LSS, PO Box 2494, Sioux Falls, SD 57101” containing \$5 in cash; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$5 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

xx. First Class Mail from “[M.L.] [address redacted] Luverne, MN 56156” to “L.S.S., PO Box 2494, Sioux Falls, SD 57101” containing \$70 in cash and a note stating “Mike & Chris” “I owe 70.00” “Thanks [M.L.]”; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$70 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

yy. First Class Mail from “[R.] [address redacted] Fargo, ND 58103” to “L.S.S., PO Box 2494, Sioux Falls, SD 57101” containing 2 checks made out to 5-Star from D.R. for the amount of \$25 and from K.R. for the amount of \$30; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$55 in checks is presently in the custody of the USPIS.

zz. First Class Mail from “[R.T.] [address redacted] Elyston, MN 56028”

to "Mike or Chris Reisch, 1908 River Bluff Dr., Brandon, SD 57005" containing a check made out to cash for \$100 and a note stating "Thanks Guys!" "[R.]"; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$100 check is presently in the custody of the USPIS.

aaa. First Class Mail from "[J.C., W.A.] [address redacted] Sioux Falls, SD 57107" to "Mike Reisch, 1908 River Bluff Dr., Brandon, SD 57005" containing a check made out to Mike Reisch for \$460 and a note stating "To Mike" "From [J.C.]"; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$460 check is presently in the custody of the USPIS.

bbb. First Class Mail from "[J.G.], [address redacted] Fort Pierre, SD 57532-0685" to "1908 River Bluff Dr, Brandon, SD 57005" containing \$160 in cash and a white envelope addressed to J.G. with a return address of 1908 River Bluff Dr., Brandon, SD 57005; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$160 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ccc. First Class Mail from "[D.K.] [address redacted] Hendrick, MN 56134" to "L.S.S., PO Box 2494, Sioux Falls, SD 57101" containing \$360 in cash and a note stating "Thanks Mike" "Get rest after Super Bowl" "Thanks [D.K.]"; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$360 in cash was turned into a check, is presently in the custody of

the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ddd. Three (3) one-ounce Gold Eagle coins seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The three coins are presently in the custody of the U.S. Postal Inspection Service.

eee. 1 one-ounce gold maple leaf coin seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The coin is presently in the custody of the USPIS.

fff. 1 #5 1901 gold coin seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The coin is presently in the custody of the USPIS.

ggg. 1 1/10th of an ounce Gold Eagle coin seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The coin is presently in the custody of the USPIS.

hhh. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005", to "[H.M.] [address redacted], Rock Rapids, IA 51246" containing \$48 in cash; seized after mailed pursuant to a search warrant dated January 22, 2009. The

\$48 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

iii. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005", to "[G.M.] [address redacted], Rock Rapids, IA 41246", containing \$15 in cash; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$48 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

6. Items listed in paragraphs 5. a. through 5.c. and 5.e. through 5. ggg. were also seized on April 30, 2009, pursuant to the seizure warrant dated April 30, 2009.

7. When indicating that the cash above was turned into checks, the following checks were issued:

- a. Check #452589 dated March 12, 2009, for \$520 from the Sioux Falls Federal Credit Union. This is from the mailings that were opened as a result of the February 18, 2009, warrant.
- b. Check #451772 dated February 9, 2009, for \$408,177.00 and check #451830 dated February 10, 2009, for \$1000 from the Sioux Falls Federal Credit Union. These checks represent the cash seized from the home on January 22, 2009, and the mailings that

were opened as a result of the January 22, 2009, and January 27, 2009, warrants.

8. The temporary forfeiture account is the account where the USPIS holds seized funds until they are forfeited or holds the funds pre-forfeiture until they are transferred to another agency.

JURISDICTION AND VENUE

9. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

10. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b):

a. Pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district; or

b. Pursuant to 28 U.S.C. § 1355(b)(1)(B), incorporating 28 U.S.C. § 1395, because the action accrued in this district and/or the defendant is found in this district.

11. Venue is proper in this district:

a. Pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district; or

b. Pursuant to 28 U.S.C. § 1395, because the action accrued

in this district; the defendants are found in this district; and/or the property is located in this district.

STATUTORY BASIS FOR FORFEITURE

12. The defendant property and the defendant real property, as well as the personal property located within the home listed in paragraph 3.a., is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) which provides, in pertinent part:

(a)(1) The following property is subject to forfeiture to the United States:

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of . . . any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title)

13. Section 1956(c)(7) defines in part the term “specified unlawful activity” to mean “any act or activity constituting an offense listed in section 1961(1) of this title” Section 1961(1) lists sections 1952, 1953, 1955, and 1084.

14. Pursuant to 18 U.S.C. § 981(a)(1)(C), the United States alleges that the defendant property and defendant real property is subject to forfeiture to the United States because it constitutes proceeds or is derived from proceeds traceable to a violation of sections 1084, 1952, 1953, and/or 1955 of Title 18, United States Code.

a. Section 1084 states:

Whoever being engaged in the business of betting or wagering knowingly uses a wire communication facility for the transmission in interstate or

foreign commerce of bets or wagers or information assisting in the placing of bets or wagers on any sporting event or contest, or for the transmission of a wire communication which entitles the recipient to receive money or credit as a result of bets or wagers, or for information assisting in the placing of bets or wagers, shall be fined under this title or imprisoned not more than two years, or both.

b. Section 1952 states:

Whoever travels in interstate or foreign commerce or uses the mail or any facility in interstate or foreign commerce, with intent to –

(1) distribute the proceeds of any unlawful activity; or
(2) commit any crime of violence to further any unlawful activity; or
(3) otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity, and thereafter performs or attempt to perform –

(A) an act described in paragraph (1) or (3) shall be fined under this title, imprisoned not more than 5 years, or both; or

(B) an act described in paragraph (2) shall be fined under this title, imprisoned for not more than 20 years , or both, and if death results shall be imprisoned for any term of years or for life.

c. Section 1953 states:

(a) Whoever, except a common carrier in the usual course of business, knowingly carries or sends in interstate or foreign commerce any record, paraphernalia, ticket, certificate, bills, slip, token, paper, writing, or other device used, or to be used, or adapted, devised, or designed for use in (a) bookmaking; or (b) wagering pools with respect to a sporting event; or (c) in a numbers, policy, bolita, or similar game shall be fined under this title or imprisoned for not more then five years or both.

d. Section 1955 states:

(a) Whoever conducts, finances, manages, supervises, directs, or owns all or part of an illegal gambling business shall be fined under this title or imprisoned not more than five years, or both.

(b) As used in this section –

(1) “illegal gambling business” means a gambling business which –

(I) is a violation of the law of a State or political subdivision in which it is conducted;

(ii) involves five or more persons who conduct, finance, manage, supervise, direct or own all or part of such business; and

(iii) has been or remains in substantially continuous operation for a period in excess of thirty days or has gross revenue of \$2,000 in any single day.

(2) "gambling" includes but is not limited to pool-selling, bookmaking, maintaining slot machines, roulette wheels or dice tables, and conducting lotteries, policy, bolita or numbers games, or selling chances therein.

15. In the alternative, the defendant real property, the personal property described in paragraph 3.a., and the vehicle is also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) which provides, in pertinent part:

(a)(1) The following property is subject to forfeiture to the United States:

(A) Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957, or 1960 of this title, or any property traceable to such property.

16. Pursuant to 18 U.S.C. § 981(a)(1)(A), the United States alleges that the defendant real property, the personal property described in paragraph 3.a, and the vehicle seized is subject to forfeiture to the United States because it is involved in a transaction or attempted transaction in violation of section 1956 or 1957 of this title, or any property traceable to such property. Said sections state:

a. 18 U.S.C. § 1956(a)(1)(A)(i) makes it a violation of law for an individual to knowingly conduct or attempt to conduct a financial transaction affecting interstate or foreign commerce, which involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of the

specified unlawful activity and that while conducting or attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

Whoever violates this section shall be sentenced to a fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years or both.

b. 18 U.S.C. § 1956(a)(1)(B)(i) makes it a violation of law for an individual to knowingly conduct or attempt to conduct a financial transaction affecting interstate or foreign commerce, which involved the proceeds of a specified unlawful activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of said specified unlawful activity and that while conducting or attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. Whoever violates this section shall be sentenced to a fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than twenty years or both.

c. 18 U.S.C. § 1957 makes it a violation of law for an individual to knowingly engage or attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is a deposit,

withdrawal, transfer, or exchange of U.S. Currency, funds, or a monetary instruments (as defined in section 1956(c)(5)), by, through, or to a financial institution, including any transaction that would be a financial transaction under section 1956(c)(4)(B) of this title, such property having been derived from a specified unlawful activity. The punishment for an offense under this section is a fine under Title 18, United States Code, or imprisonment for not more than ten years or both. The court may impose an alternate fine to that under Title 18 of not more than twice the amount of the criminally derived property involved in the transaction.

FACTS SUPPORTING BASIS FOR FORFEITURE

17. The entire complaint is incorporated herein by reference.

18. In support of the forfeiture of the items which have been seized as listed above, the United States relies on and incorporates herein by reference the Affidavit signed by Adel Valdes, United States Postal Inspector, submitted in support of the United States Application for Seizure Warrant, in Misc: 09-53, 09-54, 09-55, 09-56, and 09-57. This affidavit is under seal pursuant to Court order.

19. During the investigation of Mike Reisch, it was discovered that he and Luverne Sports had a bank account with Great Western Bank. A review of the bank records for seized account #XXXXXX7555 at Great Western Bank, revealed that it was being utilized to deposit proceeds of Mike Reisch's book making operation.

20. A review of the bank records from the seized Great Western Bank account #XXXXXX4070 in the name of Christopher Reisch revealed: bulk cash deposits made out to Mike Reisch and cash; checks from individuals known to be customers of Mike Reisch's bookmaking operation as identified in records seized from Mike Reisch's residence; a number of checks deposited from individuals who have also had checks deposited into Mike Reisch's Great Western Bank account #XXXXXX7555; numerous cash withdrawals; a number of checks written from the account to individuals known to be customers of Mike Reisch's bookmaking operation; checks made out to Kathy Jensen; and none of the deposits appeared to be from lawful employment. As discussed below, Reisch paid betting debts with cash.

21. A review of the bank records from the seized Wells Fargo account #XXXXXX3385 in the name of Christopher Reisch indicates: numerous deposits over \$10,000; numerous ATM withdrawals in the amount of \$800; two of the \$800 withdrawals coincide with receipts found during the search of Mike Reisch's residence; the bulk of the deposits are checks made out to Mike Reisch; the bulk of the checks deposited come from individuals known to be customers of Mike Reisch's bookmaking operation based upon records seized from the residence of Mike Reisch; and none of the deposits appeared to be from lawful employment.

SECTION 1957

22. The entire complaint is incorporated herein.

23. On or about the dates set forth below, but not necessarily limited to the transactions set forth below, Michael Reisch, Sr., and/or Chris Reisch, or others, did knowingly engage or attempt to engage in the following monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, transfer, or exchange of U.S. currency, funds, or monetary instruments, such property having been derived from a specified unlawful activity, that is, a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955:

TRANS-ACTION #	CHECK #	ITEM DATE	WITHDRAWAL AMOUNT	PAYEE	ACCOUNT	ACCOUNT HOLDER ON CHECK
1	44502 03418	01/19/2007	\$19,000.00	Mike Reisch	xxxxx4070	Chris Reisch
2	1158	06/07/2007	\$20,000.00	Kathy Jensen	xxxxx4070	Chris Reisch
3	(counter check)	06/14/2007	\$39,944.83	Great Western Bank	xxxxx2658	Mike Reisch
4	2886	07/23/2007	\$14,452.25	Gerry Concrete	xxxxx2658	Kathy Jensen
5	2888	08/22/2007	\$10,135.80	Gerry Concrete	xxxxx2658	Kathy Jensen
6	3036	10/29/2007	\$10,008.77	Component Manufacturing Co.	xxxxx2658	Kathy Jensen
7	3214	05/01/2008	\$11,251.74	Countrywide Home	xxxxx2658	Kathy Jensen

24. Transaction 1 discussed in paragraph 23 above used illegal

proceeds generated from a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955 to purchase the vehicle discussed in paragraph 5.d. above, the 2007 Gold Yukon Denali, VIN 1GKFK63887J290988, bearing SD License 1WC 518.

25. When the 2007 Yukon was purchased, Mike Reisch traded in his 2004 GMC Yukon LUX, VIN #1GKEK63UX4J173059 for a value of \$25,600.00. The vehicle which Mike Reisch traded in was also purchased with illegal proceeds generated from a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955. Mike Reisch endorsed a check which was made out to Reisch from G.A.P. [name redacted] Trust, a gambling client of Mike Reisch. The check was in the amount of \$17,080.00. Reisch paid an additional \$1955 in cash for the 2004 GMC Yukon. The rest of the 2004 GMC Yukon was paid for with the trade-in of the vehicle Reisch owned at that time – a 2001 GMC Yukon LUX, VIN # 1GKEK63UX1J1192688.

26. Transaction 1 discussed in paragraph 23 through 25, the trade-in discussed in paragraph 25, and cash in the amount of \$950 were all used to pay for the purchase of the 2007 Gold Yukon Denali and are all proceeds from a specified unlawful activity, to wit violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955.

27. Mike Reisch has not had any employment other than his book-making business for the last eight (8) or nine (9) years, and he has been a bookie for about twenty (20) years. A review of bank records reveals deposits of slightly less than \$18,000 between January 12, 2007 and December 16, 2008,

from Kathy Jensen Reisch's employment. The Great Western Bank account #XXXXXX4070 was used to deposit proceeds from violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955.

28. As to transaction 2 discussed in paragraph 23 above, on or about June 7, 2007, Mike Reisch issued check #1158 to Kathy Jensen, nka Kathy Reisch, the wife of Mike Reisch, Sr. The check was issued from Chris Reisch's Great Western Bank account #XXXXXX4070. This account was used to deposit proceeds from violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955. On or about June 7, 2007, this check was endorsed by Kathy Jensen Reisch and deposited into the joint bank account of Mike Reisch and Kathy Jensen Reisch at Great Western Bank, account # XXXXX2658.

29. Transaction 3, 4, 5, 6, and 7 discussed in paragraph 23 above are payments which were made to the payee to pay off debt owing on the home which Mike Reisch and Kathy Reisch were building at the time and/or residing in at the time and the home in which they now reside. The bank account XXXXX2658, from which these payments were made, was used to deposit proceeds from violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955.

30. On or about the dates set forth below, but not necessarily limited to the dates or acts set forth below, Michael Reisch, Sr., Kathryn Jensen and/or Chris Reisch, or others, did knowingly engage or attempt to engage in the following monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a

value greater than \$10,000, that is the deposit, withdrawal, transfer, or exchange of U.S. currency, funds, or monetary instruments, such property having been derived from a specified unlawful activity, that is, a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955:

TRANS-ACTION #	CHECK #	ITEM DATE	WITHDRAWAL AMOUNT	PAYEE	ACCOUNT	ACCOUNT HOLDER ON CHECK
1	3157	02/04/2008	\$17,876.52	Martin Design	xxxxx2658	Kathy Jensen
2	3171	02/08/2008	\$18,025.16	Lamperts	xxxxx2658	Kathy Jensen
3	3183	02/20/2008	\$21,680.00	Brandon Plumbing & Heating	xxxxx2658	Kathy Jensen
4	3225	03/03/2008	\$26,767.78	Martin Design	xxxxx2658	Kathy Jensen
5	3197	04/15/2008	\$12,251.74 ⁶	Countrywide Home Loans	xxxxx2658	Kathy Jensen
6	3214	05/01/2008	\$11,251.74	Countrywide Home	xxxxx2658	Kathy Jensen
7	3308	07/25/2008	\$11,251.74	Countrywide Home Loans	xxxxx2658	Kathy Jensen

31. Transaction one (1) through and including seven (7) which are discussed in paragraph 30 are payments which were made to the payee to pay off debt owing on the home which Mike Reisch and Kathy Reisch were building at the time and/or residing in at the time and the home in which they presently reside. This home is titled solely in Kathy Reisch's name. The bank

⁶Bank account records show that although the check is written for \$12,251.74, the bank deducted only \$2,251.74 from the account.

account from which these payments were made, XXXXX2658, was used to deposit proceeds from violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955. From on or about January 2007 through December 8, 2008, over \$400,000 of illegal proceeds was deposited into this account. Tracing for these transactions is permitted pursuant to 18 U.S.C. § 984.

32. Payments for expenses relating to the construction and completion of the home were also made with cash. Records seized from the residence of Mike Reisch and Kathy Reisch indicate cash payments in relation to the home. Mike Reisch, or others, did knowingly engage or attempt to engage in the following monetary transaction by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, transfer, or exchange of U.S. currency, funds, or monetary instruments, such property having been derived from a specified unlawful activity, that is, a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955, when at a minimum, a \$12,000 cash payment was made to Brian R,⁷ for services relating to the home, during the construction of the home which was approximately August of 2007 to March of 2008.

⁷ Rest of the name is difficult to read given the penmanship, may be Brian Reo.

33. The transactions constituting money laundering set forth above may be expanded on at trial should discovery reveal additional transactions in violation of Section 1957.

SECTION 1956

34. The entire complaint is incorporated herein by reference.

35. On or about the dates alleged below, but not necessarily limited to the dates or acts alleged below, Mike Reisch, Christopher Reisch or Kathryn Reisch, or others, did knowingly conduct or attempt to conduct the following financial transactions affecting interstate or foreign commerce, which involved the proceeds of a specified unlawful activity, that is violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955, with the intent to promote the carrying on of said specified unlawful activity or knowing that the transaction was designed in whole or in part to conceal or disguise, the nature, location, source, ownership, or control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transactions, the individual knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity, all in violation of Title 18 U.S.C. §§ 1956(a)(1)(A)(i) or 1956(a)(1)(B)(i):

TRANS-ACTION #	CHECK #	ITEM DATE	WITHDRAWAL AMOUNT	PAYEE	ACCOUNT #	ACCOUNT HOLDER ON CHECK
1	3157	02/04/2008	\$17,876.52	Martin Design	xxxxx2658	Kathy Jensen

2	3162	02/06/2008	\$ 1,142.19	Builder's Millwork	xxxxx2658	Kathy Jensen
3	3161	02/06/2008	\$ 7,426.85	Sorlein Electric	xxxxx2658	Kathy Jensen
4	3172	02/11/2008	\$ 5,471.04	SOS	xxxxx2658	Kathy Jensen
5	3160	02/06/2008	\$ 7,794.84	Als Finishing	xxxxx2658	Kathy Jensen
6	3171	02/08/2008	\$18,025.16	Lamperts	xxxxx2658	Kathy Jensen
7	3183	02/20/2008	\$21,680.00	Brandon Plumbing & Heating	xxxxx2658	Kathy Jensen
8	3223	02/28/2008	\$ 4,630.57	First Dakota Title	xxxxx2658	Kathy Jensen
9	3225	03/03/2008	\$26,767.78	Martin Design	xxxxxx2658	Kathy Jensen
10	3197	04/15/2008	\$12,251.74 ⁸	Countrywide Home Loans	xxxxx2658	Kathy Jensen
11	3214	05/01/2008	\$11,251.74	Countrywide Home Loans	xxxxx2658	Kathy Jensen
12	3287	06/26/2008	\$ 1,251.74	Countrywide Home Loans	xxxxx2658	Kathy Jensen
13	3308	07/25/2008	\$11,251.74	Countrywide Home Loans	xxxxx2658	Kathy Jensen
14	3341	08/28/2008	\$ 1,251.74	Countrywide Home Loans	xxxxx2658	Kathy Reisch
15	3365	09/26/2008	\$ 1,251.74	Countrywide Home Loans	xxxxx2658	Kathy Jensen
16	3419	10/29/2008	\$ 1,251.74	Countrywide Home Loans	xxxxx2658	Kathy Reisch
17	3439	11/28/2008	\$ 1,251.74	Countrywide Home Loans	xxxxx2658	Kathy Reisch
18	44502 03418	01/19/2007	\$19,000.00	Mike Reisch	xxxxx4070	Chris Reisch
19	1158	06/07/2007	\$20,000.00	Kathy Jensen	xxxxx4070	Chris Reisch

⁸ Bank account records show that although the check is written for \$12,251.74, the bank deducted only \$2,251.74 from the account.

20	counter check	06/14/2007	\$39,944.83	Great Western Bank	xxxxx2658	Mike Reisch
21	2886	07/23/2007	\$14,452.25	Gerry Concrete	xxxxx2658	Kathy Jensen
22	2888	08/22/2007	\$10,135.80	Gerry Concrete	xxxxx2658	Kathy Jensen
23	3036	10/29/2007	\$10,008.77	Component Manufacturing Co.	Xxxxx2658	Kathy Jensen
24	3214	05/01/2008	\$11,251.74	Countrywide Home	xxxxx2658	Kathy Jensen
25	3135	01/13/2008	\$ 7,957.77	Martin Design	xxxxx2658	Kathy Jensen
26	3138	01/20/2008	\$ 8,879.80	Martin Design	xxxxx2658	Kathy Jensen

36. Including, but not limited to, the facts set forth in paragraph 41(d), indicate that Kathryn Reisch and Mike Reisch knew that the property involved represented proceeds of some form of unlawful activity. Kathryn Reisch, should she allege ignorance, would be deemed to have turned a willfully blind eye, viewed as having deliberate ignorance or conscious avoidance. Mike J. Reisch as well as Mike R. Reisch, Jr. and Chris Reisch were intimately involved in the bookmaking operation. Mike R. Reisch, Jr. and Chris Reisch knew the nature of his father's business as he answered calls from customers calling to place bets.

37. Mike J. Reisch hired Mike R. Reisch, Jr. to be the general contractor for the construction of his home. To do so, based upon notes seized from the

search of the residence of Mike J. Reisch's home, it appears Mike R. Reisch, Jr. was ultimately paid approximately \$55,750.

38. As discussed in paragraph 32, evidence seized reveals cash payments made to pay down debt on the home. Whoever issued cash payments for expenses relating to the construction of the residence of Mike Reisch, to wit Mike Reisch, Kathy Reisch, Mike R. Reisch, Jr., Chris Reisch and/or others, did knowingly conduct or attempt to conduct the following financial transactions affecting interstate or foreign commerce, which involved the proceeds of a specified unlawful activity, that is violations of 18 U.S.C. §§ 1084, 1952, 1953, or 1955, with the intent to promote the carrying on of said specified unlawful activity or knowing that the transaction was designed in whole or in part to conceal or disguise, the nature, location, source, ownership, or control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transactions, the individual knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity, all in violation of Title 18 U.S.C. §§ 1956(a)(1)(A)(i) or 1956(a)(1)(B)(i).

39. The transactions constituting money laundering set forth above may be expanded on at trial should discovery reveal additional transactions in violation of Section 1956 or 1957 which support the forfeiture of the assets seized.

THE CONSPIRACY TO LAUNDER MONEY

40. The entire complaint is herein incorporated by reference.

41. From on or about the date June 14, 2007 through the present, in the District of South Dakota and elsewhere, Michael Reisch, Sr., and Kathryn Reisch and/or Chris Reisch, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957, to wit, all in violation of Title 18, United States Code, Section 1956(h):

(a) the violations of Title 18, United States Code, Section 1956(a)(1)(A)(i) as set forth above;

(b) the violations of Title 18, United States Code, Section 1956(a)(1)(B)(i) as set forth above; and/or

(c) the violations of Title 18, United States Code, Section 1957 as set forth above;

(d) the manner and means used to accomplish the objectives of the conspiracy between Kathryn Reisch and Michael Reisch, Sr., included, among others, but is not necessarily limited to, the following: Mike Reisch, Sr., purchased a piece of real property located at 1908 River Bluff Drive, Brandon, South Dakota and a warranty deed was recorded on June 18, 2007, solely in his name; following the purchase of the property by Michael Reisch, he transferred the real property located at 1908 River Bluff Drive, in Brandon, South Dakota to Kathryn A. Jensen; the warranty deed transferring the

property from Michael Reisch to Kathryn A. Jensen was recorded on July 19, 2007; during 2007, Michael Reisch and Kathryn A. Jensen began building a home on the property he had transferred to her; on or about July 23, 2007, Kathryn A. Jensen obtained a loan, as a single woman, solely in her name, with Great Western bank for the construction of the home; the amount of the construction loan was \$301,000.00 and the term of the loan was August 15, 2007 to May 15, 2008; a satisfaction of the mortgage relating to the construction loan was filed with the Minnehaha County Register of Deeds on March 18, 2008, at Book 1593, p. 268; a document seized from the home of Michael J. Reisch sets forth the total cost of building the home at \$557,514.41; many of the bills relating to the construction of the home came in the name of Michael Reisch despite the home being solely titled in Kathryn Jensen's name; following the completion of the construction of the home a promissory note and mortgage securing said note was taken out with Great Western Bank on February 28, 2008, for approximately \$175,000; the balance on the construction loan after expending \$557,514.41 to build the home was approximately \$174,253.21 as of January 7, 2008; the remaining balance on the construction note was transferred to the promissory note which was entered into on or about February 28, 2008; the mortgage taken out on February 28, 2008, was subsequently assigned to Countrywide Home Loans; while the home was being built, illegal gambling proceeds were deposited in the joint bank account which Kathryn Reisch and Michael Reisch had at Great

Western Bank, Account #XXXXX2658; while the home was being built and/or following the completion of the building of the home illegal proceeds were used to pay down the debt owing on the home, construction expenses relating to the home, decorating expenses in relation to the home, and/or other expenses relating to the home. On August 22, 2008, Michael Reisch and Kathryn A. Jensen were married.

42. In the alternative to conspiracy alleged above, Kathy Reisch, or others, aided and/or abetted Mike Reisch, Chris Reisch, Mike R. Reisch, Jr., or possibly others, in laundering violations pursuant to Title 18 Section 1956 or 1957 as set forth above.

PERSONAL PROPERTY IN HOME

43. The entire complaint is incorporated herein by reference.

44. Forfeiture of the personal property in the home is sought, though seizure is not sought at this time. Based upon the investigation to date, there is probable cause to believe that either the property described in paragraph 3.a. constitutes proceeds traceable to a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955, or that the purchases were made with the intent to promote the carrying on of said specified unlawful activity or knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds of said specified unlawful activity and that while conducting or attempting to conduct such financial transactions, the individual knew that the property involved in the financial

transactions represented the proceeds of some form of specified unlawful activity, all in violation of Title 18 U.S.C. § 1956(a)(1)(A)(i) or 1956(a)(1)(B)(i), for the same reasons laid out in paragraphs 34 through 42 above or violations of 18 U.S.C. § 1957 as set forth above in paragraphs 22 through 33.

SECTION 1084

45. The remainder of the complaint is incorporated herein by reference.

46. Between, on, or about November 29, 2007, and continuing to the present, in the District of South Dakota, Michael J. Reisch, or those working with and/or for him, being engaged in the business of betting or wagering did knowingly use a wire communication facility, as described in the examples below the telephone, for the transmission in interstate or foreign commerce of bets or wagers or information assisting in the placing of bets or wagers on any sporting event or contest, or for the transmission of a wire communication which entitles the recipient to receive money or credit as a result of bets or wagers, or for information assisting in the placing of bets or wagers, to wit, all in violation of 18 U.S.C. § 1084.

47. Examples of the types of telephone conversations which Mike Reisch or those working with or for him had with gambling customers are as follows:

Date on Tape:	Customer and State Located:	Bets With or Speaks With:	Time:	Notes:
11/27-11/30/2008	D.R., ND	Carroll Chrans	11:17	(2) bets \$25 each
11/27-11/30/2008	R.W., ND	Carroll Chrans	11:22	(2) bets \$25 each
11/27-11/30/2008	J.S., MN	Carroll Chrans	11:38	(3) bets \$50 each
11/27-11/30/2008	C.W., IA	Carroll Chrans	11:43	(6) bets for \$600
11/27-11/30/2008	T.Z., MI	Carroll Chrans	11:50	(6) bets for \$300
11/27-11/30/2008	P.M., IA	Carroll Chrans	12:01	(4) bets for \$600
1/10-1/17/2009 Side A	T.Z., MI	Chris	5:50	(8) bets of \$200 each
1/10-1/17/2009 Side A	C.W., IA	Chris	5:53	(8) bets of \$100 each
1/10-1/17/2009 Side A	M.A., IA	Chris		Gets lines and totals
1/10-1/17/2009 Side A	J.R., MN	Chris	11:05	\$25 bet
1/10-1/17/2009 Side A	B.V., IA	Chris	11:35	\$300 bet
1/10-1/17/2009 Side A	H.B., MN	Chris	11:35	\$300 bet
1/10-1/17/2009 Side A	B.L., AK	Chris	2:09	\$50 bet
1/10-1/17/2009 Side A	D.R., ND	Mike Jr.		\$25 bet

1/10- 1/17/2009 Side A	C.W., IA	Mike Jr.		(5) bets for \$190
1/10- 1/17/2009 Side A	S.D., ND	Mike Jr.	6:53	(3) bets for \$2500
1/10- 1/17/2009 Side A	K.G., IA	Mike Jr.		\$200 bet
1/10- 1/17/2009 Side A	J.L., ND	Mike		\$200 bet
1/10- 1/17/2009 Side A	M.T., WI	Mike		\$50 bet
1/10- 1/17/2009 Side B	J.R., NE	Mike	11:40	(2) bets for \$1500
1/10- 1/17/2009 Side B	M., MN	Mike	11:45	\$200 bet
1/10- 1/17/2009 Side B	M.L., MN	Mike		\$50 bet
1/10- 1/17/2009 Side B	S.K., MN	Mike	11:50	\$100 bet
1/10- 1/17/2009 Side B	B.L., AK	Mike	11:57	(2) bets for \$200
1/10- 1/17/2009 Side B	S., state unknown	Mike	12:00	Lays off
1/10- 1/17/2009 Side B	G.M., IA	Mike		\$10 bet
1/10- 1/17/2009 Side B	C.W., IA	Mike	3:00	\$300 bet

1/10- 1/17/2009 Side B	K.H., CO	Mike	3:14	\$50 bet
1/10- 1/17/2009 Side B	J.L., ND	Mike	3:27	(3) bets for \$500
1/10- 1/17/2009 Side B	M.L., MN	Mike	3:32	\$100 bet
1/10- 1/17/2009 Side B	C.W., IA	Mike	3:44	\$500 bet
11/27- 11/30/2008 Side A	P.D., NE	Carroll Chrans		Chrans explains the rules on winning and losing bets
11/30- 12/14/2008 Side B	M.B., SD	Carroll Chrans		Chrans states "We are year around, basketball, football, baseball, colleges, pro."
12/8- 12/14/2008 Line #2		Chris		Records the lines message on the answering machine customers call to find out the odds
12/8- 12/14/2008 Line #2	Chris	P., SD		Chris lays off bets on P. because told by Mike to do so
12/8- 12/14/2008 Line #2	Chris	B. state unknown		Chris lays off bets on B.
12/8- 12/14/2008		Mike		Records lines message for Saturday 12/13/2008
12/8- 12/14/2008		Mike		Records lines message for 12/14/2008
1/10- 1/17/2009 Side A	Chris	Sports Vince state unknown		Chris lays off bets on Vince
1/10- 1/17/2009 Side A	Chris	P., SD		Chris lays off B.B. bets on P.
1/10- 1/17/2009 Side A	Mike	V. State unknown		Mike lays off bets on V.

1/10- 1/17/2009 Side A	Chris	V. State unknown		Chris lays off bets on V.
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48. In running his bookmaking operation, Reisch's customers placed their bets via phone or facsimile.

49. Mike Reisch and Christopher Reisch had business cards printed in the name of Luverne Sports with the names "Mike & Chris Reisch" also on the business card.

50. The Luverne Sports business card listed four telephone numbers for customers to use to place their bets or get the lines for upcoming games. The four numbers listed are as follows: 888-248-9166, 800-540-8780, 582-6287 and 582-3112.

51. Telephone number 582-6287 is registered to Mike Reisch at 1908 River Bluff Drive, Brandon, South Dakota.

52. Toll free number 888-248-9166 was listed on Express Mail flat #EH315747248US mailed to Mike Reisch, 1908 River Bluff Drive, Brandon, South Dakota from Pierre, South Dakota.

53. The back of a Luverne Sports card obtained during the investigation had football odds and the rules for winning printed on it.

54. Mike Reisch, Chris Reisch, Mike Reisch, Jr., and Carroll Chrans would take bets from customers over the telephone when they called.

55. At a minimum, Mike or Chris would record the lines message on

the 800 number line which customers would call to get the lines for their bets.

56. Mike Reisch has a website, www.5starlines.com which lists the games and lines for the week. This website was listed on the Luverne Sports business card.

57. Mike Reisch's customers were not all located in the state of South Dakota. A review of the files found pursuant to the search warrant of Mike Reisch's residence revealed Mike Reisch's bookmaking operation took bets at a minimum from individuals in South Dakota, Minnesota, North Dakota, Iowa, Nebraska, Florida, Colorado, Michigan, Wisconsin, North Carolina, Texas and Arizona.

58. Out of state bettors interviewed acknowledged that they would place bets with Mike Reisch's bookmaking operation via the telephone or by facsimile.

59. The defendant property, defendant real property, personal property listed in paragraph 3.a., and the vehicle constitute proceeds or are derived from proceeds traceable to a violation of 18 U.S.C. § 1084, in whole or in part.

60. Records seized pursuant to the search warrant of Mike Reisch's residence indicate that at a minimum from January 11, 2009 through January 19, 2009, Mike Reisch's bookmaking operation took bets in the amount of \$858,900.00. A total of \$572,945.00 of these bets were taken by phone or fax from out-of-state customers as indicated by the sampling of recorded phone calls set forth above.

SECTION 1952

61. The entire complaint is incorporated herein by reference.

62. Between, on, or about November 29, 2007, and continuing to the present, Michael J. Reisch, or those working for or with him, travels in interstate or foreign commerce or uses the mail or any facility in interstate or foreign commerce with the intent to distribute the proceeds of any unlawful activity, to wit violations of 18 U.S.C. §§ 1084, 1953 or 1955, or otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity, to wit violations of 18 U.S.C. §§ 1084, 1953 or 1955, and thereafter performs or attempts to perform an act described in Title 18, United States Code, Section 18 U.S.C. § 1952(a)(1), (2), or (3), all in violation of 18 U.S.C. §1952.

63. Mike Reisch would settle the bets placed by his customers using the US Mail.

64. A search of thirty-nine mail pieces pursuant to a search warrant dated January 22, 2009, revealed that the pieces of mail were being mailed to known customers of Mike Reisch's bookmaking operation. A search of the mail pieces revealed that Mike Reisch was settling his accounts and was sending US currency and checks to individuals who had a winning balance.

65. Mike Reisch would send the proceeds of his bookmaking operation via the US Mail in cash or check form.

66. Some betting customers of Mike Reisch's bookmaking operation have stated that Mike Reisch would settle his gambling debts by sending just cash through the mail while others stated that he would send cash or check.

67. Reisch's bettors would also pay their gambling debts via the mail.

68. Examples of envelopes mailed which contained gambling proceeds, which were searched pursuant to a search warrant, and represent violations of 18 U.S.C. § 1952 are as follows:

<u>Eg. #</u>	<u>Date</u>	<u>From/Address</u>	<u>To</u>	<u>Contents</u>
1	10/14/2008	Mike Reisch 1908 River Bluff Dr. Brandon, SD 57005	R.N., Fargo, ND	\$24,000 in cash
2	01/21/2009	1908 River Bluff Dr. Brandon, SD 57005	C.D., Mason City, IA	\$300 in cash
3	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	J.R., Omaha, NE	\$2000 in cash
4	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	J.S., Spencer, IA	\$1000 in cash
5	1/21/2009	1908 River Bluff Dr. Brandon, SD 57005	J.R., Spencer, IA	\$410 in cash
6	1/21/2009	1908 River Bluff Dr. Brandon, SD 57005	T.S., Mason City, IA	\$890 in cash
7	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	S.G., Chandler, AZ	Check for \$4,325
8	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	M.L., Waterloo, IA	Check for \$965
9	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	T.S., Mason City, IA	\$45 in cash
10	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	T.K., Luverne, MN	\$200 in cash

11	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	V.K., Edgerton, MN	\$400 in cash
12	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	J.R., Luverne, MN	\$3 in cash
13	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	C.S., Hartington, NE	\$50 in cash
14	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	L.P., Hartington, NE	\$120 in cash
15	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	R.V., Okoboji, IA	\$270 in cash
16	1/20/2009	1908 River Bluff Dr. Brandon, SD 57005	D.S., Hartington, NE	\$90 in cash
17	01/20/2009	1908 River Bluff Dr. Brandon, SD 57005	H.M., Rock Rapids, IA	\$48 in cash
18	01/20/2009	1908 River Bluff Dr. Brandon, SD 57005	G.M., Rock Rapids, IA	\$15 in cash

69. Cash and check payments sent to Reisch for gambling debts were seized via search warrants dated January 27, 2009, and February 18, 2009. See example Paragraphs 5. pp. to 5. ccc. above. The mailings contained at paragraphs 5. pp. to 5. ccc. also represent violations of 18 U.S.C. § 1952.

70. In the alternative, the calls listed in paragraph 47 above would also represent violations of 18 U.S.C. § 1952. The calls and recordings are made to otherwise promote, manage, establish, carry on, or facilitate the promotion,

management, establishment, or carrying on, of any unlawful activity, to wit violations of 18 U.S.C. §§ 1084, 1953 or 1955.

71. In the alternative, the mailings listed in paragraph 77 below would also represent violations of 18 U.S.C. § 1952. The mailings containing wagering paraphernalia to otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity, to wit violations of 18 U.S.C. §§ 1084, 1953, or 1955.

72. The defendant property, defendant real property, personal property contained within paragraph 3.a., and the vehicle constitute proceeds or are derived from proceeds traceable to a violation of 18 U.S.C. § 1952, in whole or in part.

SECTION 1953

73. The entire complaint is herein incorporated by reference.

74. Between, on, or about November 29, 2007, and continuing to the present, in the District of South Dakota, Michael J. Reisch did knowingly carry or send in interstate or foreign commerce any record, paraphernalia, ticket, certificate, bills, slip, token, paper, writing, or other device used, or to be used, or adapted, devised, or designed for use in (a) bookmaking; or (b) wagering pools with respect to a sporting event; or (c) in a numbers, policy, bolita, or similar game, in violation of Title 18, United States Code, Section 1953(a).

75. Michael J. Reisch would deposit for mailing at the Brandon Post

Office and the Sioux Falls Post Office, First Class mailings containing wagering paraphernalia, including, but not necessarily limited to, mailings containing wagering paraphernalia listing the lines for sporting events which he would use to take bets from his bookmaking operation customers, business cards for Luverne Sports, and bills, papers, and/or writings containing the current status of a customer's account.

76. The investigation of Mike Reisch revealed that some of the mail pieces which Mike Reisch receives are addressed to L.S.S., S Sports, Reisch Sports, Sports Service, and Luverne Sports.

77. The following table contains an example of mailings made by Michael J. Reisch in violation of Section 1953(a):

Example #	Date	From	To	Contents
1	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	C.D., Mason City, IA	Wagering paraphernalia listing the lines for sporting events
2	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.R., Spencer, IA	Wagering paraphernalia listing the lines for sporting events
3	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.R., Omaha, NE	Wagering paraphernalia listing the lines for sporting events
4	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	P.G. Rock Valley, IA	Wagering paraphernalia listing the lines for sporting events
5	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	P.H, Canby, MN	Wagering paraphernalia listing the lines for sporting events
6	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	C.W., Carroll, IA	Wagering paraphernalia listing the lines for sporting events

7	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.P., Rock Rapids, IA	Wagering paraphernalia listing the lines for sporting events
8	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.Z., Livonia, MI	Wagering paraphernalia listing the lines for sporting events
9	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.V., Canby, MN	Wagering paraphernalia listing the lines for sporting events
10	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	N.S., Larch- wood, IA	Wagering paraphernalia listing the lines for sporting events
11	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	O.R., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
12	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.S., Harting- ton, NE	Wagering paraphernalia listing the lines for sporting events
13	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	P.D., Harting- ton, NE	Wagering paraphernalia listing the lines for sporting events
14	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	H.B., Marshal, MN	Wagering paraphernalia listing the lines for sporting events
15	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	K.G., Spencer, IA	Wagering paraphernalia listing the lines for sporting events
16	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.D., Harting- ton, NE	Wagering paraphernalia listing the lines for sporting events
17	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	L.P., Harting- ton, NE	Wagering paraphernalia listing the lines for sporting events
18	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	N.K., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
19	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.H., Harting- ton, NE	Wagering paraphernalia listing the lines for sporting events

20	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.P., Rockford, IA	Wagering paraphernalia listing the lines for sporting events
21	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.S., Battle Lake, MN	Wagering paraphernalia listing the lines for sporting events
22	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.E., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
23	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.S., Rockwell, IA	Wagering paraphernalia listing the lines for sporting events
24	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.B., Benedict, MN	Wagering paraphernalia listing the lines for sporting events
25	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.L., Rudd, IA	Wagering paraphernalia listing the lines for sporting events
26	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	C.F., Rock Falls, IA	Wagering paraphernalia listing the lines for sporting events
27	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	B.B., Marshall, MN	Wagering paraphernalia listing the lines for sporting events
28	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.T., La Crosse, WI	Wagering paraphernalia listing the lines for sporting events
29	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.B, Marshall, MN	Wagering paraphernalia listing the lines for sporting events
30	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.E., New Market, MN	Wagering paraphernalia listing the lines for sporting events
31	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	L.E., Okoboji, IA	Wagering paraphernalia listing the lines for sporting events
32	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.R., Winona, MN	Wagering paraphernalia listing the lines for sporting events

33	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.C., Rock Valley, IA	Wagering paraphernalia listing the lines for sporting events
34	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.W., Hague, ND	Wagering paraphernalia listing the lines for sporting events
35	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	V.K., Edgerton, MN	Wagering paraphernalia listing the lines for sporting events
36	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	B.L., Eagan, MN	Wagering paraphernalia listing the lines for sporting events
37	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.E., Engle- wood, CO	Wagering paraphernalia listing the lines for sporting events
38	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	P.S., Perhaum, MN	Wagering paraphernalia listing the lines for sporting events
39	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	L.C., Canby, MN	Wagering paraphernalia listing the lines for sporting events
40	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.J., Falls, OH	Wagering paraphernalia listing the lines for sporting events
41	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	A.K., Superior, WI	Wagering paraphernalia listing the lines for sporting events
42	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.B, Fargo, ND	Wagering paraphernalia listing the lines for sporting events
43	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	B.B., Ogilvie, MN	Wagering paraphernalia listing the lines for sporting events
44	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	K.H., Denver, CO	Wagering paraphernalia listing the lines for sporting events
45	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.L., Waterloo, IA	Wagering paraphernalia listing the lines for sporting events

46	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.H, Fort Dodge, IA	Wagering paraphernalia listing the lines for sporting events
47	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	S.D., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
48	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.L., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
49	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	F.S., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
50	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.M., Moore- head, MN	Wagering paraphernalia listing the lines for sporting events
51	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	L.B., Goodyear, AZ	Wagering paraphernalia listing the lines for sporting events
52	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.F., Wilming- ton, NC	Wagering paraphernalia listing the lines for sporting events
53	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.S., Benson, MN	Wagering paraphernalia listing the lines for sporting events
54	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.O., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
55	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.C., Rock Valley, IA	Wagering paraphernalia listing the lines for sporting events
56	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	R.V. Okoboji, IA	Wagering paraphernalia listing the lines for sporting events
57	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.R., Luverne, MN	Wagering paraphernalia listing the lines for sporting events
58	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.K., Hardwick, MN	Wagering paraphernalia listing the lines for sporting events

59	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.C., Arnolds Park, IA	Wagering paraphernalia listing the lines for sporting events
60	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	A.B., Luverne, MN	Wagering paraphernalia listing the lines for sporting events
61	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.S., Spencer, IA	Wagering paraphernalia listing the lines for sporting events
62	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.S., Mason City, IA	Wagering paraphernalia listing the lines for sporting events
63	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.G., Tulsa, OK	Wagering paraphernalia listing the lines for sporting events
64	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	C.W., Sibley, IA	Wagering paraphernalia listing the lines for sporting events
65	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.H., Moor- head, MN	Wagering paraphernalia listing the lines for sporting events
66	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	E.F., Redwood Falls, MN	Wagering paraphernalia listing the lines for sporting events
67	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.M., Luverne, MN	Wagering paraphernalia listing the lines for sporting events
68	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.C., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
69	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	S.K., Adrian, MN	Wagering paraphernalia listing the lines for sporting events
70	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.R., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
71	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.L., Luverne, MN	Wagering paraphernalia listing the lines for sporting events

72	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	C.B., Peoria, AZ	Wagering paraphernalia listing the lines for sporting events
73	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	M.R., Rock Valley, IA	Wagering paraphernalia listing the lines for sporting events
74	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.S., Jackson, MN	Wagering paraphernalia listing the lines for sporting events
75	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.S., Mason City, IA	Wagering paraphernalia listing the lines for sporting events
76	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	G.M., Luverne, MN	Wagering paraphernalia listing the lines for sporting events
77	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	T.K., Luverne, MN	Wagering paraphernalia listing the lines for sporting events
78	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.R., Fargo, ND	Wagering paraphernalia listing the lines for sporting events
79	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	B.H., Luverne, MN	Wagering paraphernalia listing the lines for sporting events
80	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.K., Nora Springs, IA	Wagering paraphernalia listing the lines for sporting events
81	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	J.D., Fairmont, MN	Wagering paraphernalia listing the lines for sporting events
82	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	D.K., Rock Rapids, IA	Wagering paraphernalia listing the lines for sporting events
83	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	G.M., Rock Rapids, IA	Wagering paraphernalia listing the lines for sporting events
84	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	H.M., Rock Rapids, IA	Wagering paraphernalia listing the lines for sporting events

85	12/17/2008	1908 River Bluff Dr. Brandon, SD 57005	B.V., Rock Rapids, IA	Wagering paraphernalia listing the lines for sporting events
86	1/21/2007	1908 River Bluff Dr. Brandon, SD 57005	C.D., Mason City, IA	2009 Super Bowl Wagering paraphernalia
87	1/21/2009	1908 River Bluff Dr. Brandon, SD 57005	M.L., Rudd, IA	Note requesting payment and Luverne Sports business card

78. The notes contained in the mailings seized pursuant to search warrants dated January 22, 2009; January 27, 2009; and February 18, 2009 also constitute violations of section 1953(a). See Paragraph 5.e. to 5. ccc. above.

79. When interviewed, M.L. of Luverne, MN, acknowledged receiving wager sheets listing the lines for sporting events from Mike Reisch via the US Mail. He provided a copy of a mailing that he had received from Mike Reisch containing information for the basketball games from February 24, 2009 thru April 15, 2009. This mailing is another example of a violation of 18 U.S.C. § 1953(a).

80. Other betting customers of Mike Reisch's bookmaking operation who were interviewed also acknowledged receiving wager sheets listing the lines for sporting events from Mike Reisch via the US Mail.

81. The defendant property, defendant real property, personal property listed in paragraph 3.a., and the vehicle constitute proceeds or are derived from proceeds traceable to a violation of 18 U.S.C. § 1953, in whole or in part.

SECTION 1955

82. The entire complaint is herein incorporated by reference.

83. Between November 27, 2007, and continuing to the present Mike Reisch, Chris Reisch, Mike R. Reisch, Jr., Carroll Chrans, Kathy Reisch, and others conducted, financed, managed, supervised, or owned all or part of an illegal gambling business in violation of Title 18, United States Code Section 1955(a).

84. It was part of the scheme that Mike Reisch, Chris Reisch, Mike R. Reisch, Jr., and Carroll Chrans all took bets from customers of the business via phone lines.

85. Mike Reisch and Chris Reisch also took part in recording the lines for upcoming games on their 800 phone-line which was available for customers to call.

86. Kathy Reisch opened a PO Box at the Sioux Falls post Office in the name of L.L.S. in order to facilitate the mailing of payments from customers.

87. Kathy Reisch also took part in the business by facilitating the movements of funds through her and Mike Reisch's Great Western Bank account.

88. Chris Reisch was also involved in the movement of proceeds from the business through his bank accounts at Wells Fargo and Great Western.

89. Mike Reisch would send lines for future games through the mail to his out-of-state betting customers.

90. Mike Reisch would drop off outgoing mail at the post office which was being sent to bettors. Mike Reisch's only employment is his bookmaking operation and he maintains records consistent with a bookmaking operation.

91. The defendant property, defendant real property, personal property listed in paragraph 3.a., and the vehicle constitute proceeds or are derived from proceeds traceable to a violation of 18 U.S.C. § 1955(a), in whole or in part.

TIME FRAME FOR ILLEGAL ACTIVITY

92. It is anticipated that additional evidence will be acquired during the course of civil discovery with regard to the income generated from illegal gambling activities prior to the investigation beginning, on or about November 29, 2007, and that the United States intends to claim as the basis for forfeiture all illegal proceeds and property which can be traced as proceeds of the violations set forth above within the statute of limitations for forfeiture. The same holds true for money laundering. Should discovery reveal additional money laundering which would support forfeiture based upon the violations alleged above, those additional money laundering crimes which would support the forfeiture would be presented at trial within the statute of limitations for forfeiture.

PERSONAL PROPERTY IN HOME

93. The entire complaint is incorporated herein by reference.


94. Forfeiture of the personal property set forth in paragraph 3.a. of this complaint is sought as part of this complaint. Seizure is not sought at this

time as discussed above. Based upon the investigation to date, there is probable cause to believe that either the property described in paragraph 3.a. constitutes proceeds derived from property traceable to a violation of 18 U.S.C. §§ 1084, 1952, 1953, or 1955 or is personal property involved in a transaction or attempted transaction in violation of section 1956 or 1957.

PRAYER FOR RELIEF

95. WHEREFORE, following notice of this action to all persons who reasonably appear to be potential claimants of interests in the property; the United States prays that the defendant property and defendant real property be forfeited and condemned to the United States of America; that the plaintiff be awarded its costs and disbursements in this action and for such other and further relief as this Court deems proper and just.

Dated: July 20, 2009.

MARTY J. JACKLEY
United States Attorney

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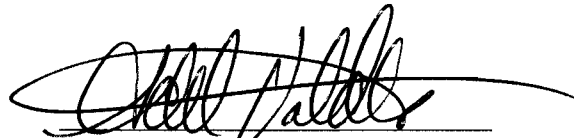
VERIFICATION

I, Adel Valdes, hereby verify and declare under penalty of perjury that I am an Inspector with the United States Postal Inspection Service, that I have

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others and case agents of other agencies, as Inspector for the United States Postal Inspection Service.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: July 20, 2009.



Adel Valdes, Inspector